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April 14, 2022

VIA ECF

Honorable Michael A. Hammer
United States District Court for the
District of New Jersey
Martin Luther King Courthouse
50 Walnut Street Room 2C
Newark, NJ 07101

**Re: *United States v. Matthew Goettsche, et al.*, 19-CR-877 (CCC)
Proposed Modification of Pretrial Release Order**

Dear Judge Hammer:

Please accept this letter in lieu of a more formal motion on behalf of Defendant Matthew Goettsche. We respectfully move to modify his bail conditions as follows:

1. Permission to attend his children's sports games only on weekends with a third-party custodian. Each game, including time and location, must be pre-approved by Pretrial.
2. Permission to attend church services on Sundays with a third-party custodian.
3. Permission to accompany a third-party custodian to pick up his children after school on weekdays.

The Court's Order Setting Conditions of Release (dkt. 171) requires Mr. Goettsche remain at his residence under home incarceration and that he "shall remain in the presence of a third-party custodian at all times unless otherwise approved by Pretrial Services." The Court previously approved proposed bail modifications to these conditions (dks 187, 193, 225, and 229).

Pretrial Services has no objection to our proposed requests. The government, through AUSA Jamie Hoxie, defers to Pretrial Services. Thank you in advance.

Respectfully submitted,

/s/

Rodney Villazor, Esq.
SMITH VILLAZOR LLP

Hon. Michael A. Hammer

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